

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

APPLE INC,

Plaintiff,

v.

MASIMO CORPORATION and SOUND  
UNITED, LLC,

Defendants.

Civil Action No. 22-1377 (MN) (JLH)

**REDACTED - PUBLIC VERSION**

APPLE INC,

Plaintiff,

v.

MASIMO CORPORATION and SOUND  
UNITED, LLC,

Defendants.

Civil Action No. 22-1378 (MN) (JLH)

**REDACTED - PUBLIC VERSION**

**DECLARATION OF BILAL MUHSIN IN SUPPORT OF MASIMO'S JULY 3, 2023  
LETTER TO THE HONORABLE JENNIFER L. HALL FROM JOHN C. PHILLIPS, JR.**

John C. Phillips, Jr. (No. 110)  
Megan C. Haney (No. 5016)  
PHILLIPS, MCLAUGHLIN & HALL, P.A.  
1200 North Broom Street  
Wilmington, Delaware 19806  
Telephone: (302) 655-4200  
jcp@pmhdelaw.com  
mch@pmhdelaw.com

Dated: July 3, 2023

*Attorneys for Defendants*

**CONFIDENTIAL - ATTORNEYS' EYES ONLY**

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**FILED UNDER SEAL**

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EYES ONLY**

**FILED UNDER SEAL**

**DECLARATION OF BILAL MUHSIN**

I, Bilal Muhsin, declare as follows:

1. I am the Chief Operating Officer (“COO”) at Masimo Corporation. I have personal knowledge of the facts set forth herein and, if called upon to do so, I could and would testify competently to them.

2. I have been COO of Masimo since May 2019. My responsibilities as COO include overseeing operations, engineering, research and development, regulatory, and quality control. As part of these responsibilities, I oversee manufacturing, including the manufacturing of Masimo’s W1.

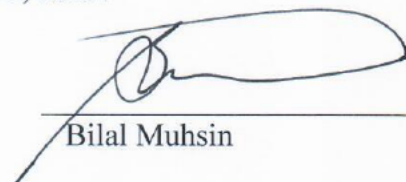
The Honorable Jennifer L. Hall  
July 3, 2023

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3. I understand that Apple is accusing the W1 with the wave electrode, the Freedom Watch, and the Freedom Band ("Forthcoming Products") of patent infringement. [REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 3, 2023.

  
Bilal Muhsin